

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

BIENVENIDO I. LUGO MARCHANT,  
Plaintiff,

v.

PETER TSICKRITZIS, KEVIN  
KINGSTON and UNITED LIQUORS  
LIMITED,  
Defendants.

Civil Action No. 05 11317 NMG

**DEFENDANTS' STATEMENT PURSUANT TO RULE 16.1**

It appears that Plaintiff, acting *pro se*, filed his own proposed pretrial schedule and discovery plan. Defendants are now filing their own proposed schedule because they believe Plaintiff's will not provide sufficient time to complete tasks. Accordingly, Defendants propose the following:

**Proposed Pretrial Schedule and Discovery Plan**

March 31, 2006	Plaintiff to disclose his experts and expert reports
May 31, 2006	Defendants to disclose their experts and expert reports
June 30, 2006	Deadline for completion of all fact and expert discovery, including requests for production of documents, interrogatories and witness depositions
August 31, 2006	Deadline for filing dispositive motions, if either party determines that such a motion is appropriate
September 29, 2006	Deadline for filing oppositions to dispositive motions
October 31, 2006	Deadline for filing reply to oppositions to dispositive motions

Defendants understand that this discovery schedule assumes the cooperation of Plaintiff, Defendants, all third party witnesses, and expert witnesses.

**Certification**

Defendants' certification required by Local Rule 16.1(D)(3) will be filed simultaneously with this document.

Respectfully submitted,

UNITED LIQUORS LIMITED, PETER  
TSICKRITZIS and KEVIN KINGSTON,

/s/ Joan Ackerstein

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Dated: December 16, 2005